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11 *Attorneys for Plaintiffs and the Putative Class in lead action*
12 *Opperman, et al., v. Path, Inc. et al., No. 13-cv-00453-JST*

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 MARC OPPERMAN, et al.,

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18 Plaintiffs,

19 v.

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21 PATH, INC., et al.,

22 Defendants.
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Case No. : 13-cv-00453-JST

CLASS ACTION

AFFADAVIT UNDER CLRA SECTION 1780 (d)

THIS DOCUMENT RELATES TO ALL CASES

Hernandez v. Path, Inc., No. 12-cv-1515-JST

Pirozzi v. Apple, Inc., No. 12-cv-1529-JST

Gutierrez v. Instagram, Inc., No. 12-cv-6550-JST
(collectively, the "Related Actions")

AFFADAVIT UNDER CLRA SECTION 1780 (d)

**AFFIDAVIT
UNDER CLRA §1780(d)**

1. I, STEPHEN DEAN, submit this affidavit pursuant to § 1780(d) of the *Consumers Legal Remedies Act* and declare as follows:

2. I am a named plaintiff in the Consolidated Amended Class Action Complaint in case no. 13-CV-00453-JST in the U.S. District Court for the Northern District of California. If called as a witness, I could and would competently testify to all facts within my knowledge.

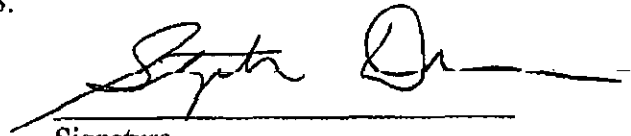
3. I am filing this affidavit pursuant to California Civil Code § 1780.

4. I understand that the complaint my attorneys filed on my behalf and on behalf of those similarly situated includes claims against Apple, Inc. for violations of California Civil Code § 1770(a).

5. Defendant Apple Inc. is a California corporation operating and doing business throughout California and the United States, with its principal place of business in Cupertino, California. My counsel filed this action in the Northern District of California based on my belief that Apple is headquartered in Santa Clara County, California, which upon information and belief is located within this District. Upon information and belief, this district is a proper place for trial of this action.

6. I declare under penalty of perjury under the laws of the state of California and the United States of America that the foregoing is true and correct.

Executed this 5th day of September, 2013.



Signature

STEPHEN DEAN

Printed Name